

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**IN RE NATIONAL PRESCRIPTION  
OPIATE LITIGATION**

This document relates to:

*County of Summit, et al. v. Purdue  
Pharma L.P., et al*; Case No. 1:18-  
op-45090

**MDL No. 2804**

**Case No. 17-md-2804**

**Judge Dan Aaron Polster**

**PLAINTIFFS' MOTION FOR LEAVE TO FILE ITS OPPOSITION TO TEVA  
PHARMACEUTICALS INDUSTRIES LTD.'S MOTION TO DISMISS FOR LACK OF  
PERSONAL JURISDICTION, AND RELATED DECLARATIONS  
UNDER SEAL**

Pursuant to Local Rule 5.2, Plaintiffs seek leave of Court to seal Plaintiffs' Opposition to Teva Pharmaceuticals Industries Ltd.'s Motion to Dismiss for Lack of Personal Jurisdiction and related papers. Plaintiffs' papers were filed Friday July 5, 2019, and have the following ECF Docket Numbers, and currently should be sealed:

- Docket No. 1815: Opposition Brief
- Docket No. 1816: Declaration of Mark G. Crawford in Support of Opposition
- Docket No. 1817: Declaration of Alec Fahey in Support of Opposition

Plaintiffs file this Motion and Proposed Order to ensure compliance with CMO No. 2: Protective Order (ECF Doc. 441). Plaintiffs respectfully request the option to proceed in this manner to preclude inadvertent disclosure of confidential information subject to CMO No. 2.

WHEREFORE, Plaintiffs respectfully request the Honorable Court to grant Plaintiffs' Motion for Leave to File Its Opposition to Teva Pharmaceuticals Industries Ltd.'s Motion to Dismiss for Lack of Personal Jurisdiction, and Related Declarations Under Seal, and to place Docket Nos. 1815, 1816, and 1817 filed July 5, 2019 under seal.

Respectfully Submitted:

DATED: July 8, 2019

/s/ Mark G. Crawford

Steven J. Skikos

Mark G. Crawford

P. Dylan Jensen

SKIKOS, CRAWFORD, SKIKOS & JOSEPH  
LLP

One Sansome Street, Suite 2830

San Francisco, CA 94104

Tel: 415-546-7300

Fax: 415-546-7301

sskikos@skikos.com

mcrawford@skikos.com

djensen@skikos.com

*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on July 8, 2019, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system. Copies will be served upon counsel of record by, and may be obtained through, the Court CM/ECF Systems.

DATED: July 5, 2019

/s/ Mark G. Crawford  
Mark G. Crawford